

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF JEFFREY M. GOULD IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO COX'S MOTION TO EXCLUDE THE TESTIMONY OF PUTATIVE
EXPERT WILLIAM H. LEHR, Ph.D.**

I, Jeffrey M. Gould, hereby declare:

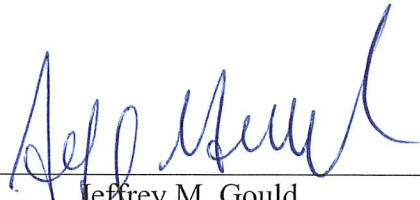
1. I am Senior Counsel Oppenheim + Zbrak, LLP, and am admitted to practice law in the District of Columbia, among other jurisdictions. I am counsel for Plaintiffs in the above-captioned case. I have personal knowledge of all facts stated in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Opposition to Cox's Motion to Exclude the Testimony of Putative Expert William H. Lehr, Ph.D., filed contemporaneously herewith.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the December 1, 2015 Hearing Transcript in *BMG Rights Mgmt. (US) LLC v. Cox Commc'ns, Inc.*, No. 1:14-cv-1611.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 24, 2019 in Washington, District of Columbia.



Jeffrey M. Gould
Counsel for Plaintiffs